

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: JOSEPH COLUCCI Debtor	Case No. 19-16972-amc
Freedom Mortgage Corporation, Movant	Chapter 13
vs. JOSEPH COLUCCI Respondent	11 U.S.C. §362

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Freedom Mortgage Corporation (hereinafter “Movant”) has filed a Motion for Relief from the Automatic Stay with the Court.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **February 8, 2024**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant’s attorney:

Brock and Scott, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on **February 13, 2024 at 11:00 AM**, in Courtroom #4, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office in Philadelphia at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

January 25, 2024

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IN RE: JOSEPH COLUCCI Debtor	Case No. 19-16972-amc
Freedom Mortgage Corporation, Movant	Chapter 13
vs. JOSEPH COLUCCI Respondent	11 U.S.C. §362

**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Motion and Motion for Relief from the Automatic Stay at the addresses shown below or on the attached list on **January 25, 2024**.

The types of service made on the parties were: Electronic Notification and First Class Mail.

**Service by First Class Mail**

JOSEPH COLUCCI  
9315 RISING SUN AVE  
PHILADELPHIA, PA 19115

**Service by Electronic Notification**

MICHAEL SETH SCHWARTZ  
Law Office of Michael Schwartz  
707 Lakeside Office Park  
Southampton, PA 18966  
[msbankruptcy@gmail.com](mailto:msbankruptcy@gmail.com)

Kenneth E West  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107  
[ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107  
[USTPRegion03.PH.ECF@usdoj.gov](mailto:USTPRegion03.PH.ECF@usdoj.gov)

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification" and those served by mail will be listed under the heading: Service by First Class Mail.

This is the 25th day of January, 2024.

/s/Andrew Spivack  
Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: [PABKR@brockandscott.com](mailto:PABKR@brockandscott.com)